



49 Woodside Street, Stamford, CT 06902

February 27, 2013

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
1 Congress Street, Suite 1100 - CPT
Boston, Massachusetts 02114-2023

RE: 2nd Revision to PCB Cleanup and Disposal Notification
Joseph A. DePaolo Middle School, 385 Pleasant Street, Southington, CT

Dear Ms. Tisa:

I am submitting the following answers and revisions (**in bold**) to the PCB cleanup and disposal notification for the Joseph A DePaolo Middle School at the above referenced location, based on our phone conversation and your e-mails dated February 25, 2013 & February 27, 2013:

February 25, 2013

1. At DePaolo you are proposing to remove approximately 700 square feet of wall, which I assume you are classifying as a PCB bulk product waste. **That is correct.**

Perhaps I missed this, but on page 26 of the November 2012, I did not see a disposal/remediation code for these walls that will be removed. **"PCB-16 Remove existing exterior wall moisture barrier, cinderblock and brick and dispose of PCB Bulk Product Waste >50 PPM" has been added to this page. The note has also been added to the table and the drawings in the specification.**
2. Also, with respect to the verification sampling, you indicate that there will be approximately 572 samples collected; however, I'm not clear on the distribution. As we discussed this morning, you will need to sample on the CMU located adjacent to the corner caulk to support the < 1 ppm on the interior, even though the exterior of the block will have the vapor barrier (February 18, 2013 Revision, Page 5, Response #27). Thus, please provide a breakdown of the verification sampling that is proposed (e.g., # column samples, #CMU located adjacent to columns, # CMU located adjacent to corner caulk, etc). **Please find the attached table showing the sampling breakdown and the addition of the exterior CMU wall sampling.**
3. In February 18, 2013 Revision, Page 5, Response 26.a.ii., you indicate that verification sampling will be performed following removal of the PCB waste materials identified on page 39, Section 1.5 of the November 2012 submittal. Is this true? I believe you've deemed these materials an Excluded PCB Product. Accordingly, I just need to distinguish the verification sampling that is required pursuant to 40 CFR Part 761 from that you are doing to satisfy the state or the school. **Since we do not have sample results for the proposed cut line, we are proposing to do verification sampling on these doors to verify that the remaining materials meet the State DEEP standard of <1 PPM.**
4. In the February 18, 2013 Revision, page 6, Response 29, you indicate that PCB wastes < 50 ppm will be disposed of in a municipal waste landfill or equivalent. I'm not clear what that means or if these facilities are different from those facilities proposed for disposal of the PCB bulk product waste. I assume that the PCB wastes you are referencing here the PCB Excluded Product wastes...please confirm. **That is correct; these items refer to the excluded products.**

February 27, 2013

1. I had previously asked about the possibility of capacitors (associated with the motor) within the univents. If capacitors are present and are original, it is highly likely that these capacitors contain PCBs. **The entire unit, including any capacitors that may be present, is scheduled to be removed and disposed of as PCB bulk product waste >50 PPM.**
2. In your Feb. 18, 2013 response #21a, it is confusing. You indicate that there is a steel lintel above the windows but that there is brick on the sides and the bottom. You then say that the window unit and "metal sill" will be removed. You had previously indicated that the steel lintel above the window would be removed. Thus, could you clarify the reference to "metal sill". While I understand that you have designated the caulk associated with the windows as an Excluded PCB Product regulated for disposal under the state regulations, I thought that clarification regarding what materials are being removed is needed for plan completeness and accuracy. **Please find the attached photo description.**
3. As a final point of clarification for DePaolo, and provided that the data is adequate and sufficient to support the classification of the majority of building materials at this site as an Excluded PCB Product, the disposal/remediation codes applicable to this project as it pertains to the federal PCB regulations would be PCB-07, PCB-08, and PCB-11. Please confirm. However, I believe you also still need a code for walls to be removed with the vapor barrier (approximately 670 square feet). **This is correct. The code for the PCB vapor barrier removal is PCB-16 as indicated in the February 25, 2013 answer #1.**
4. In your Feb. 18, 2013 response letter you indicated that the majority of the red doors are double doors. On the PCB Source Mat. Table, you provided a distinction between caulk samples collected on exterior metal double doors versus caulk collected on exterior red doors. Given your response, above, were any of the metal double door caulk also red door caulk? I ask because of my previous question regarding how many samples of each type of matrix location were collected versus total #'s present. As I recall, you indicated that there were 14 (I think) red doors. Thus I'm not sure if you actually have more than 3 samples (081412-15 through 17) of the red door caulk. **During the visual inspection of the source materials, prior to sampling, the doors were classified as different because of their color. The red doors had been painted and the casings and caulk had been painted as well. Based on the visual inspection the doors were assumed to be different and sampled separately. Three samples were collected from the unpainted doors and three samples were collected from the red painted doors. There are approximately eight (8) unpainted doors and ten (10) red doors.**

Phone Conversation

During our phone conversation you raised one additional issue that was not included in your e-mails. The question was raised in reference to the first revision letter dated February 18, 2013. I have included the original question below with a revised response.

27. Pages 40-41. Verification Inspection and Sampling

- a. The following sentence is unclear: "The outer walls associated with the metal columns corner room corners will not be sampled since the PCB containing vapor barrier will remain in place on these surfaces".
 - ii. It is EPA's understanding that with the exception of certain walls to be removed, the vapor barrier will remain in place. As such, and given that the current configuration of the Site was not provided, it is unclear what walls will be impacted by the renovations and which walls will not.

3. Please clarify the total square footage of vapor barrier that will remain in-place at the Site following the renovation. **The original estimated quantity of the exterior moisture barrier is approximately 35,000 square feet. There is approximately 700 square feet of material proposed for removal to allow the new additions to be tied into the existing building. Once removal is completed there will be approximately 34,300 square feet of material remaining at the site.**

Thank you in advance for your time. If you have any questions, comments, concerns or would like to discuss this issue further please call me at the office 203-324-2222. Thank you.

Regards,



James Twitchell
HYGENIX Inc.

ATTACHMENT A

**REVISED PCB LOCATION & EXTENT TABLE TO INCLUDE
CONFIRMATION SAMPLE NUMBERS**

JOSEPH A. DEPAOLO MIDDLE SCHOOL
385 PLEASANT STREET, SOUTHINGTON, CT
LOCATION & EXTENT OF THE IDENTIFIED CONTAMINATED AREA – 761.61 (3)(C)

UNIT TYPE	# of UNITS	LOCATION	LOCATION of MATERIAL	TOTAL QUANTITY	DISPOSAL CODE #s	# of CONTAMINATION SAMPLES
Building Windows	33 windows	Exterior	- Caulk on steel lintel - Caulk on window base - Caulk on window sides/jamb	- 1,450 LF - 1,450 LF - 240 LF	PCB-01 PCB-02	0
Exterior Doors	20 doors	Exterior	- Caulk on steel lintel - Caulk on door sides/jamb - Caulk on door sides/jamb	- 120 LF - 300 LF - 300 LF	PCB-01 PCB-02	0
Expansion Joint	31 locations	Exterior	- Caulk in expansion joint	- 600 LF	PCB-03	0
Metal Through Wall Flashing Caulk	N/A	Exterior	- Caulk along top of metal flashing	- 1,000 LF	PCB-04	0
Sidewalk Black Fill	N/A	Exterior	- Black fill in concrete sidewalk	- 300 LF	PCB-05	0
Chimney Caulk	1 chimney	Exterior	- Caulk on 4 sides of chimney vents	- 40 LF	PCB-06	0
Metal Column Caulk	70 locations	Interior	- Caulk on both sides metal columns - One full cinderblock on both sides of column	- 420 LF - 420 LF	PCB-07	70 wipe samples from metal columns. 70 chip samples from blocks adjacent to metal columns. + duplicates and blanks
Hall & Classroom Wall Corners	577 corner	Interior	- Caulk from the wall corner - One full cinderblocks on both sides of corner	- 5,880 LF - 10,200 LF	PCB-08	577 chip samples + duplicates and blanks
Classroom Unit Ventilators	90 units	Interior	- Interior of unit ventilator	- 90 units	PCB-11	0 – the entire unit is being removed and disposed of

PCB cleanup and disposal notification under § 761.61(a) and § 761.79(h)
Joseph A. DePaolo Middle School, Southington, CT

November 2012

Wood Floor & Ceramic Floor Paper/Mastic		Interior	- Mastic under ceramic & wood floor	- 12,000 SF	PCB-09 PCB-10	0
Hall Doors	14 doors	Interior	- Caulk on 2 sides of door - 8" of cinderblock on both door sides/jamb	- 252 LF - 245 LF	PCB-12 PCB-13 PCB-14	28 + duplicates & blanks
Between Outer Brick Wall & Inner Cinderblock Wall	See maps for specific locations	Exterior	Vapor Mastic/Paper	35,000 SF	PCB-16	0 - The remaining material is located between brick and cinderblock and is not accessible

PCB cleanup and disposal notification under § 761.61(a) and § 761.79(h)
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November 2012

ATTACHMENT B
TYPICAL WINDOW COMPONENTS



Caulk along top of window on steel lintel.

Caulk along sides of window on brick

Exterior Metal Window Sill Along Base of Window



Caulk Removal From Under Metal Window Sill on Brick

Steps for Removal:

1. Remove window & metal sill along the base of the window
2. Remove remaining caulk from the steel lintel along the top of the window opening and from the brick on the sides and along the base of the window opening.